

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Ary Gold LTD**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

2. Ary Gold LTD (a/k/a Ary Gold, a/k/a Ary International Exchange, a/k/a Ary Traders, a/k/a Ary Trade) (or "Ary Gold" or "Ary Group") was created in 1972 by Abdul Razzak Yakoob, a Pakistani native businessman. Abdul Razzak Yakoob came from a Pakistani family of gold merchants, and chaired the Ary Group since 1974 with his brother Mohammad Iqbal. The head office of Ary Group is located in Dubai. The Ary Group is a conglomerate active in several industrial sectors (textiles, food, television broadcasting, and precious metals). Faced with a financial crisis in 1986, the group increased its trading operations on gold and silver bullion, through its two branches, Ary Gold and Ary Jewellers:

Ary Group started trading gold and silver in 1979. In 1994, it opened Ary Jewellers for the wholesale trade of manufactured jewelry, including Ary branded gold bars.

3. Abdul Razzak Yakoob confirmed the beginning of gold trading activity to Gulf News in 2001:

I realize that [...] we were working so hard to establish imported brands, in the end, we were hardly benefiting from the whole exercise. That's when I made up my mind to launch our own products and promote it. Those days, whatever gold that was there in the market was labeled either London Gold or Swiss Gold, so I thought of branding our gold.

4. In addition, Abdul Razzak Yakoob diversified his activities. In October 2000, he created Ary Digital by taking over Sky Digital Asian Network (formerly known as the Pakistani Channel) in the United Kingdom. The channel is currently chaired by Abdul Razzak Yakoob's nephew, Salman Iqbal. The Pakistani Channel Limited, located in London, is currently owned by Salman Iqbal (former dealer of Ary International Exchange), and his father, Mohammad Iqbal. This company is under the control of Abdul Razzak Yakoob, whose mission is thus:

The important thing for me is that, through my channel, people in all parts of the world can hear the sound of Azaan (call for prayers).

5. Since its beginning, the Ary Group grew through the Gold market. In 2002, the company acquired membership in the London Bullion Market Association. An official position on the gold market had not previously been taken by a Middle East company.

6. The Ary Group has a pattern of conduct consistent with money laundering in the Middle East. Ary was a key player in a scandal involving Benazir Bhutto in 1994. The former Pakistani Prime Minister was convicted of corruption with Abdul Razzak and Ary Gold:

In 1998, Pakistani investigators looking into government corruption found two checks, each for \$5 million, allegedly paid by ARY Gold in 1994 to Asif Ali Zardari, the husband of then-prime minister Benazir Bhutto, to secure a two-year monopoly on gold imports to Pakistan. While acknowledging he held the monopoly and shipped \$500 million in gold to Pakistan from 1994 to 1996.

7. Several executives of Ary Group were involved in the illicit scheme. It resulted from a close association between Ary Group Executives and the Bhutto government, and through the Muslim Commercial Bank. The Ary Group's responsibility in this corruption scheme was confirmed by a Pakistani court, yet the Pakistani sentence against Ary Group was rejected five times by Dubai legal authorities as baseless. Abdul Razzak was cleared of criminal charges in Dubai but still faces charges in Pakistan.

8. Abdul Razzak is President of the Memon Community in the United Arab Emirates and Chairman of the World Memon Organization (or “WMO”). Other Ary Group executives were founders and trustees of the organization, particularly Mohammad Iqbal Yakoob. The Islamic charity WMO is very close to the Pakistani government. The headquarters of the organization is based in Dubai, and is in contact with other Islamic charities, particularly Defendant World Assembly of Muslim Youth. Described as a Muslim sect, WMO set up a cultural and business community between the United Arab Emirates and Pakistan. Hussain Lawai, the President of the Muslim Commercial Bank, convicted of corruption in Pakistan in the Ary Group case, was a member of the same Memon community in Dubai.

9. Gold trading is the principal source of revenue of the Ary Group. As the United States and its allies swept toward Afghanistan's main cities in the fall of 2001, the Taliban and al Qaeda network sent waves of couriers with bars of gold and bundles of dollars across the porous border into Pakistan. Financial transactions involving transfer of gold were centered in Dubai, the commercial capital of the United Arab Emirates and directly involved Ary Gold.

10. Persons aiding and abetting al Qaeda and facilitating and sponsoring terrorist conduct recently shipped large quantities of gold out of Pakistan to Sudan with the direct assistance of Ary Gold LTD of Dubai. Ary Gold was and is a principal conduit for transfer of wealth for years by some of the co-conspirators named within the Complaints. Ary Gold engages in substantial business in the United States of America.

11. Ary Gold, a branch of Ary Group, is involved in terrorist financing according to several investigations around the world, including by the United States Bureau of Immigration and Customs Enforcement (formerly the United States Customs Service). Ary Gold engaged in

gold transactions on behalf of the Taliban and al Qaeda and in doing so offered material support and aiding and abetting to the Taliban and al Qaeda.

12. Gold trading was performed between Ary Gold and the Taliban. This “gold trail” was described by intelligence officers, law enforcement officials, gold brokers, and sources that have direct knowledge of some of al Qaeda’s financial movements. In addition, close relationships between al Qaeda operatives and Dubai gold traders were established during the United States investigations of the 1998 United States Embassy bombings in Africa. Ary Gold has a pattern of conduct as it relates to aiding and abetting and materially sponsoring international terrorism, and assisting al Qaeda.

13. The bomb that exploded at the United States Embassy in Kenya was built outside Nairobi. Kenya bomber Fazul Abdullah Mohamed (or “Fazul”) rented the house where the Kenya bomb was assembled. Prosecution witness Tamara Ratemo, a Kenyan, told the court she rented Fazul her 10-room house outside Nairobi starting May 1, 1998. She also testified that Fazul was in frequent contact with gold traders in Dubai:

- Q. And did Mr. Fazul tell you anything about why he needed such a large house?
- A. Yes, he said he had a family and he had some business people who would be coming to visit frequently.
- Q. And what kind of business people?
- A. He said the kind of people that are dealing with, they are trading in gold and they would come from Dubai.

14. Listed in the Yellow Pages of the New York, New York phone directory under the heading “Jewelry Manufacturers Equipment & Supplies in New York”, Ary Gold’s office location is listed at 22 W. 48 St., 11th floor, Office #1101, Manhattan, New York 10036.

15. On behalf of Ary Traders, Ayman M. Shahin, Head of Treasury for Ary Traders, attended an “International Precious Metals Institute to Host Gold Conference: *The Future of*

Gold: A Roundtable Discussion, on June 18, 2002 in Miami, Florida. At this conference, Ayman Shahin made a presentation during Session 3 titled “The Future of Gold Fabrication Demand”.